

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #
DATE 3/28/07

JOHANNA S. ZAPP

1623 THIRD AVENUE • SUITE 36E • NEW YORK, NEW YORK 10128

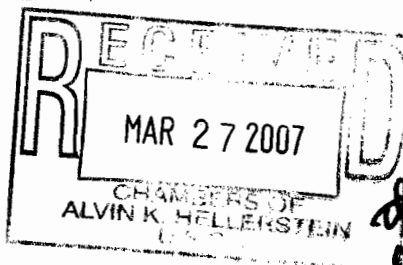
917-742-4953 • FAX 917-492-1679

ATTORNEY

NEW YORK, NEW JERSEY BARS

March 27, 2007

Hon. Alvin K. Hellerstein
United States District Court Judge
United States Courthouse
500 Pearl Street, Room 1050
New York, New York 10007



Re: United States v. Arturo Rojas-Jaime
05-CR-708

Dear Judge Hellerstein,

I represent the defendant Arturo Rojas-Jaime, Sr., in the above referenced matter. This case is on the Court's calendar on Thursday, March 29, at 10:00 A.M. Although I plan on addressing the following issue at the upcoming status conference, I thought I would write a letter to the Court prior to the appearance to address the following concern.

My client's son, Arturo Rojas, Jr. is coming to visit his father who is currently incarcerated at the MDC. Mr. Rojas Jr. is coming from Venezuela. He will be in New York for just over one week. This is the first time he has seen his father in many months. Additionally, this is the first visit his father has received from anyone other than an attorney. Given that he is coming from Venezuela to see his father, when he will be able to come again is uncertain.

The reason for this letter is this; the Mr. Mojica, the defendant's counselor at the MDC, has told my office that they will only allow Mr. Rojas, Jr. one visit per week. After speaking to Adam Johnson, Sr. in the legal department at the MDC, he suggested that I make an application to the court to request that Mr. Rojas, Jr. be allowed more visits during his only week here in the United States. His circumstances are special because he has traveled from another country to come here for the sole purpose of seeing his father. The legal department at the MDC cannot give the "ok" to allow more visits, it is the Unit Manager, Mr. Kevin Page and Mr. Mojica who can give permission for more visits under certain circumstances. With a letter (a fax may be more appropriate given that Mr. Rojas Jr. is here from March 27-April 6) from Your Honor, or perhaps an order from this Court, I believe that Mr. Rojas, Jr. would be able to see his father more than once.

As you can imagine, a visit from a family member, especially your own child, can make all the difference in the world when in a situation such as the defendant's. As I stated before, he has not seen anyone other than his attorneys in months. He is a very emotional

*In the circumstances,
Additional visits,
not interfering with
the need of good order and
discipline at the MDC,
should be allowed.
3-28-07*

man. He is very sad and depressed and I know it would make all the difference in the world to him if he were allowed a few more visits with his son other than just the one visit. This is especially true given the fact that he is unsure when his son will be able to return to the United States to visit him.

I have contacted the Government to see what their position on this issue is, however, I have not yet heard back.

Very truly yours,


Johanna S. Zapp

cc: Anirudh Bansal, AUSA
Joshua Levine, AUSA
Arturo Rojas, Sr.
Arturo Rojas, Jr.